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Attorneys for Defendants Rimini Street, Inc. and Seth Ravin

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
ORACLE AMERICA, INC., a Delaware
corporation; and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation,
and SETH RAVIN, an individual,

Defendants.

RIMINI STREET, INC.
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Case No. 2:10-cv-0106-LRH-VCF

**DECLARATION OF DOUG ZORN IN
SUPPORT OF DEFENDANTS RIMINI
STREET, INC.'S AND SETH RAVIN'S
EMERGENCY MOTION TO ENFORCE
THIS COURT'S ORDERS ENTERED AS
DOCKETS 893 & 903**

Judge: Hon. Larry R. Hicks

1 I, Doug Zorn, declare as follows:

2 1. I am a Senior Vice President and the Chief Financial Officer at Rimini Street, Inc.
3 ("Rimini"). I submit this declaration in support of Rimini's Emergency Motion to Enforce this
4 Court's Orders Entered as Dockets 893 and 903. The following facts are within my personal
5 knowledge and, if called and sworn as a witness, I could and would testify competently to these facts.

6 2. It is my understanding that at the close of trial, the Court entered a minute order as
7 well as an order entering the parties' stipulation, each stating that the Court would enter a single final
8 judgment following disposition of all post-trial motions, including Oracle's motions for attorneys'
9 fees and costs, for prejudgment interest, and for a permanent injunction.

10 3. Rimini relied on the Court's orders in structuring complex financial arrangements to
11 enable Rimini to pay the judgment in full, including the fair market value license, the damages award,
12 attorneys' fees and costs, and prejudgment interest, all within fourteen days after entry of a single
13 final judgment comprising all post-trial orders. Rimini does not have \$124 million in cash on hand,
14 but it has secured a substantial financing package, completed insurance settlements, and plans to use
15 some of its own cash to pay the judgment in full, consistent with this Court's orders.

16 4. The release of funds in this financing package is, amongst other terms and conditions,
17 contingent on all damages, attorneys' fees and costs, and prejudgment interest being owed at one time
18 based on one final judgment, consistent with this Court's post-trial orders. The investors relied on
19 this Court's order entered nearly one year ago and the certainty contained in one final judgment in
20 structuring the financing package that Rimini intends to use to pay the judgment in full.

21
22 I declare under penalty of perjury that the foregoing is true and correct. Executed at BONITA SPRINGS
23 FLORIDA on October 3, 2016.

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26 Doug Zorn
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